

driving circuit comprising another thin film transistor formed over said substrate for supplying a signal to one of said X-direction signal line and said Y-direction signal line.” Support for these amendments can at least be found in Figure 4 and the corresponding portions of the specification.

Applicants respectfully submit that Tang at least fails to teach, suggest or disclose the peripheral driving circuit as claimed. Accordingly, Tang fails to anticipate claim 10. Withdrawal of the rejection of claim 10 under 35 U.S.C. § 102(e) is respectfully requested.

The Office Action rejects claim 1 and 3 under 35 U.S.C. 103(a) as unpatentable over Applicants’ allegedly admitted prior art in view of U.S. Patent No. 4,511,756 to Moeller et al. (hereinafter “Moeller”). This rejection is respectfully traversed.

The Office Action asserts that Applicants’ allegedly admitted prior art discloses an organic electroluminescence display device comprising a thin film transistor formed over a substrate having an active layer of silicon including a source, drain and channel region. However, the Office Action concedes the allegedly admitted prior art does not explicitly state that it is formed on a substrate having an insulated surface, but that it is well known to one of ordinary skill in the art at the time of the invention to form thin film transistors on insulating substrates. The Office Action also asserts the allegedly admitted prior art teaches an electrode comprising aluminum electrically connected to one of source and drain regions having a barrier metal interposed between the electrode and the source or drain region to prevent a direct contact therebetween. Additionally, the Office Action asserts that Moeller teaches a barrier metal layer between the aluminum and the silicon and that Applicants’ allegedly admitted prior art and Moeller are combinable “because they are from the same field of endeavor.”

Applicants respectfully disagree. In particular, Moeller is directed to solar cells while the present invention is directed toward an organic electroluminescence display. M.P.E.P. § 2141.01(a) states that in order to rely on a reference as a basis for rejection of an Applicants’ invention, the reference must be either in the field of Applicants’ endeavor, or, if not, then be reasonably pertinent to the particular problem with which the inventor was concerned. Applicants’ invention is directed toward an electroluminescence display device. Additionally, the discussion in Applicants’ Description of Related Art is directed toward an organic electroluminescence display device. In contrast, Moeller is directed toward a solar cell. An electroluminescence display is a display in which various combinations of electroluminescence segments may be activated by applying voltages to produce, for example, a desired numerical or other character. In contrast, a solar cell is defined as a PN-junction device which converts the radiant energy of

sunlight directly into electrical energy.

Applicants respectfully submit that based on these definitions, and the fact that electroluminescence displays and solar cells are classified in different subclasses, Applicants' allegedly admitted prior art and Moeller are not from the same field of endeavor nor are combinable.

Furthermore, in the Description of Related Art portion of Applicants' specification, Applicants discuss the problem of using chromium as a barrier layer in an organic electroluminescence display device. That is, due to the moisture provided from the organic electroluminescence layer, elusion of the barrier metal tends to occur resulting in a decrease of reliability. The present invention is based on the recognition of this problem which is peculiar to the organic electroluminescence display device. Accordingly, Applicants respectfully submit that since the aforementioned problem is specific organic electroluminescence display device, one of ordinary skill in the art would not have looked to the teachings of Moeller to overcome the problem.

Accordingly, Applicants respectfully submit that the cited references, either alone or in combination, fail to teach, suggest or disclose each and every aspect of claims 1 and 3. Accordingly, withdrawal of the rejection under 35 U.S.C. § 103(a) is respectfully requested.

The Office Action rejects claim 2 under 35 U.S.C. § 103(a) as unpatentable over Applicants' allegedly admitted prior art in view of Moeller and further in view of U.S. Patent No. 5,550,066 to Tang et al. (hereinafter "Tang"). This rejection is respectfully traversed.

Applicants respectfully submit that Tang fails to overcome the deficiencies of the references cited in relation to the rejection of claims 1 and 3. Accordingly, and by virtue of claim 2 depending from claim 1, and the additional features recited in claim 2, Applicants respectfully submit the cited references fail to teach, suggest or disclose each and every aspect of the claim. Accordingly, the cited references fail to render obvious claim 2. Withdrawal of the rejection of claim 2 under 35 U.S.C. § 103(a) is respectfully requested.

The Office Action rejects claim 4 under 35 U.S.C. § 103(a) as unpatentable over Tang in view of Applicants' allegedly admitted prior art. Applicants respectfully submit this rejection is moot in view of the cancellation of claim 4.

The Office Action rejects claims 5-9 under 35 U.S.C. § 103(a) as unpatentable over Tang in view of Applicants' allegedly admitted prior art and further in view of Moeller. This rejection is respectfully traversed.

Applicants respectfully submit the rejection of claim 5 is moot in view of the cancellation of claim 5.

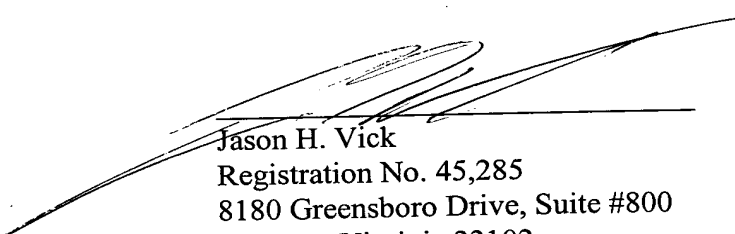
Furthermore, Applicants respectfully submit that claims 6-9 are not obvious at least in view of the remarks rebutting the rejection of the claims above. Accordingly, since the cited references fail to teach, suggest or disclose each and every aspect of claims 6-9, the references fail to render obvious claims 6-9. Withdrawal of the rejection of claims 6-9 under 35 U.S.C. § 103(a) is respectfully requested.

Accordingly, Applicants respectfully submit that claims 1-3 and 6-14 are in condition for allowance. Favorable reconsideration and prompt allowance are respectfully requested.

Should the Examiner believe anything further is desirable in order to place the application in even better condition for allowance, the Examiner is encouraged to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

NIXON PEABODY, LLP



Jason H. Vick

Registration No. 45,285

8180 Greensboro Drive, Suite #800

McLean, Virginia 22102

(703) 790-9110

EJR/JHV:gjc

**Marked-up Copy of Amended Claims**

Please amend claim 10 as follows:

10. (Amended) An organic electroluminescence display device comprising:
- a substrate having an insulating surface;
  - at least one X-direction signal line over said substrate;
  - at least one Y-direction signal line crossing said X-direction signal line;
  - a thin film transistor formed over said substrate at an intersection of said X-direction signal line and said Y-direction signal line, said thin film transistor comprising an active layer comprising crystalline silicon including source, drain and channel regions;
  - a transparent electrode electrically connected to said thin film transistor;
  - an organic luminescence layer adjacent to said transparent electrode; and
  - a peripheral driving circuit comprising another thin film transistor formed over said substrate for supplying a signal to one of said X-direction signal line and said Y-direction signal line.